

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case No. 23-cr-20481

Honorable Laurie J. Michelson

vs.

D-1 Austin Ray Sabb-Visga,

D-2 Todd Alan Sabb-Visga,

Defendants.

First Forfeiture Bill of Particulars

The United States, by and through its counsel, submits this First Forfeiture Bill of Particulars, pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure to supplement and clarify the forfeiture allegations contained in the Indictment and to provide notice of specific property the government intends to forfeit upon conviction.

The allegations set forth in the Indictment are re-alleged and incorporated herein by this reference for the purpose of alleging forfeiture pursuant to Federal Rule of Criminal Procedure 32.2(a), 18 U.S.C. § 2253 and 28 U.S.C. § 2461(c). As a result of violating the offenses set forth in Counts One through Sixteen of the

Indictment, Austin Ray Sabb-Visga and Todd Alan Sabb-Visga shall forfeit to the United States, pursuant to 18 U.S.C. § 2253 and 28 U.S.C. § 2461(c):

(a) any visual depiction described in section 2251, 2251A, or 2252 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;

(b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property,

which includes, but is not limited to the following:

- Apple iPhone Model A2342, S/N G0NFQFL70D42;
- Apple iPhone Model A2172, S/N DX3F73WD0DXW;
- Apple iPhone Model A2172, S/N F17DRB8W0DXP;
- Apple iPhone Model A2172, S/N DX3FQPRY0DXP with black and pink case; and
- LG Cricket Cell Phone

This notice does not limit the government from seeking the forfeiture of additional specific property, including substitute assets, or limit the government from seeking the imposition of a forfeiture money judgment.

Respectfully submitted,

Dawn N. Ison
United States Attorney

S/Catherine E. Morris

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Dated: January 23, 2024

Certification of Service

I hereby certify that on January 18, 2024, the foregoing document was electronically filed using the ECF system which will send notification of such filing to all ECF participants.

S/Catherine E. Morris

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